Google Inc. 1101 New York Avenue, N.W. Second Floor Washington, DC 20005



Main 202 346.1100 Fax 202 346.1101 www.google.com

July 29, 2013

## Via Electronic Filing

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Notice of Ex Parte Communication: Expanding the Economic and Innovation Opportunities of

Spectrum Through Incentive Auctions, GN Docket No. 12-268

## Dear Ms. Dortch:

On July 25, 2013, Larry Alder, Austin Schlick, and I, of Google Inc., met with David Grimaldi, Chief Counsel and Senior Legal Advisor to Acting Chairwoman Mignon Clyburn; Louis Peraertz, Legal Advisor to Chairwoman Clyburn; Sarah Whitesell, Legal Advisor to Chairwoman Clyburn; Julius Knapp, Chair, Office of Engineering and Technology; Gary Epstein, Senior Advisor to the Chairwoman and Co-Lead, Incentive Auction Task Force; Tom Peters, Chief Engineer, Wireless Telecommunications Bureau; and Edward Smith, Chief of Staff, Incentive Auction Task Force. Alan Norman, also of Google Inc., joined the discussion by teleconference.

We expressed Google's support for a balanced spectrum policy that relies on both licensed and unlicensed approaches. In particular, with respect to the Commission's pending proceeding regarding a broadcast incentive auction, we emphasized that a successful auction must free up licensed spectrum for mobile broadband. We also advocated that unlicensed operation should be permitted in the guard band(s)/duplex gap, Channel 37, and the two broadcast channels currently used exclusively by wireless microphone users. Finally, we observed that national uniformity in a band plan will minimize device costs and co-channel interference concerns and maximize the value of repurposed broadcast spectrum.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

apara Sid

Aparna Sridhar Telecom Policy Counsel

Google Inc.

cc: Via Electronic Mail

David Grimaldi

Louis Peraertz

Sarah Whitesell

Julius Knapp

Gary Epstein

Tom Peters

**Edward Smith**